

Lieberman & Klestzick

Joe Lieberman, Esq.
joe@landklegal.com

ADMITTED IN NY

Yonatan Klestzick, Esq.
yklestzick@landklegal.com

ADMITTED IN NY

Jacob Jeger, Esq.
jjeger@landklegal.com

ADMITTED IN NY, NJ, FL

Joseph Gerstel, Esq.
jgerstel@landklegal.com

ADMITTED IN NY

Abraham Beinhorn
abraham@landklegal.com

ADMITTED IN NY, NJ

Yosef Feldman, Esq.
yosef@landklegal.com

ADMITTED IN MD

James Dygert, Esq.
jdygert@landklegal.com

ADMITTED IN FL

May 2, 2025

VIA ECF

Judge Eric R. Komitee
United States District Court
Eastern District of New York
Tel: (718) 613-2165

Re: **Chana Adler v. Cheryl Feder**
Case No. 2:25-cv-02193-EK-ST

Dear Judge Komitee:

Our firm represents the plaintiff Chana Adler (“Plaintiff”) in connection with the above-referenced matter. We write this letter to address the Court’s April 28, 2025 Order directing Plaintiff to show cause why this case should not be dismissed for lack of subject-matter-jurisdiction.

As set forth in the Complaint, the parties to this action are the Plaintiff, an individual residing in Cedarhurst, New York, and defendant Cheryl Feder (“Defendant”), an individual residing in Passaic, New Jersey. See Complaint, ¶¶ 9-10. To be more specific, the parties are not merely residents of those states, they are also domiciled there. Indeed, Plaintiff is domiciled in New York, where she lives and has intent to stay, while Defendant is domiciled in New Jersey where she lives and has demonstrated intent to stay. Thus, as the parties are citizens of different states it is respectfully submitted that the Court has diversity jurisdiction. See e.g., Maitland v Fishbein, 712 F App'x 90, 91 (2d Cir 2018) (“For purposes of diversity jurisdiction, a party's citizenship depends on his domicile. Establishing one's domicile in a state generally requires both physical presence there and intent to stay”).

Please let us know if anything further is needed from our office.

Respectfully submitted,

/s/Abraham Beinhorn

Abraham S. Beinhorn